

RE: Re: OHSA Report

Hilbert, Timothy (hilbertj) to: Benson.Bob

10/04/2012 12:24 PM

From: "Hilbert, Timothy (hilbertj)" <HILBERTJ@UCMAIL.UC.EDU>

To:

Cc: "Brattin, Bill" <brattin@srcinc.com>, Berry.David@epamail.epa.gov

Bob,

How much of a division existed between track and the rest of trionizing prior to 1976 is not the important issue. The important issue is: should the slopes of declining exposures be the same for both indoor and outdoor jobs. The reason to not assume the same slope between the indoor jobs and the outdoor jobs is because we have documented efforts to reduce the indoor job exposures (pre 1976 wall) and no documentation of efforts to reduce outdoor exposures pre 1976. The efforts to reduce indoor exposures would not have a corresponding effect on outdoor exposures. Just because some of the exposure for the indoor jobs came from unloading prior to 1976 does not mean the exposures for the two areas should decline at the same rate.

-----Original Message-----

From: Bob Benson [mailto:Benson.Bob@epamail.epa.gov]

Sent: Wednesday, October 03, 2012 11:07 PM

To: Hilbert, Timothy (hilbertj); Bill Brattin; David Berry

Subject: Fw: Re: OHSA Report

Tim,

I need some help on issue 2 from Leonid. I thought the track unload and track other were outside and a conveyer system brought the ore into the expander facility and the rest of the trionizing tasks were inside. I thought the wall further isolated the track unload area and prevented more of the outside "dust" from getting inside the facility. Can you provide some information to justify?

Bill,

I think Leonid is challenging the number of segments for trionizing versus track. Your thoughts on how to proceed?

-----Forwarded by Bob Benson/R8/USEPA/US on 10/03/2012 10:55PM -----

-

To: Bob Benson/R8/USEPA/US@EPA

From: Leonid Kopylev/DC/USEPA/US

Date: 10/03/2012 01:15PM

Cc: "Bill Brattin" <brattin@srcinc.com>, Danielle

DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA,
HILBERTJ@UCMAIL.UC.EDU, Krista Christensen/DC/USEPA/US@EPA, Thomas
Bateson/DC/USEPA/US@EPA

Subject: Re: OSHA Report

Bob,

the issues in OSHA report seem to me pre-dating JEM decisions. I
see at least two issues from OSHA report that needs to be resolved
before modeling:

- 1) description of clean-up activities doesn't seem to correspond to
IH measurements, as you say below
- 2) The wording in OSHA report leads one to believe that before 1976
there was no wall between expansion and tracks. That may mean that
before 1976 there need not be division between outdoor and indoor
jobs and afterwards it may be.

Leonid

Bob Benson---10/02/2012 10:26:15 PM---I can't access the complete
IH data from home. Are you saying that the clean up values are
lower th

From: Bob Benson/R8/USEPA/US

To: Leonid Kopylev/DC/USEPA/US@EPA

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Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA,
HILBERTJ@UCMAIL.UC.EDU

Date: 10/02/2012 10:26 PM

Subject: Re: OSHA Report

I can't access the complete IH data from home. Are you saying that
the clean up values are lower than the other trionizing jobs in
late 1978 and contradict the OSHA inspectors observations about the
workers sticking their heads in the equipment during clean up
tasks?

At this point my focus is getting concurrence on the arithmetic
mean based JEM. Let's focus on the priority task.

-----Leonid Kopylev/DC/USEPA/US wrote: -----

To: Bob Benson/R8/USEPA/US@EPA

From: Leonid Kopylev/DC/USEPA/US

Date: 10/02/2012 03:49PM

Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David
Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista
Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA

Subject: Re: OSHA Report

The fitted plots would be fit to the data that is collected. The fitted values for clean-up for 1978 looks to be close to 0, not high at all.

Bob Benson---10/02/2012 05:44:44 PM---I am referring to the collection of fitted plots that Bill has constructed over the last month or so

From: Bob Benson/R8/USEPA/US

To: Leonid Kopylev/DC/USEPA/US@EPA

Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista

Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA

Date: 10/02/2012 05:44 PM

Subject: Re: OSHA Report

I am referring to the collection of fitted plots that Bill has constructed over the last month or so. Comparing values, clean-up gives higher values than other trionizing tasks except feeder and expander.

Leonid Kopylev---10/02/2012 03:37:32 PM---Bob, Could you please specify what exactly IH data you have in mind for clean-up? What I see for 19

From: Leonid Kopylev/DC/USEPA/US

To: Bob Benson/R8/USEPA/US@EPA,

Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista

Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA

Date: 10/02/2012 03:37 PM

Subject: Re: OSHA Report

Bob,

Could you please specify what exactly IH data you have in mind for clean-up? What I see for 1978 (time of OSHA report) clean-up IH measurements average to <0.1 f/cc and range between 0 and 0.9 f/cc and exponential fit for this year giving estimate close to 0.

Thanks,

Leonid

Bob Benson---10/02/2012 05:08:52 PM---I did read the material that Tim sent. At this point I think my preference is to expand the UC appe

From: Bob Benson/R8/USEPA/US
To: Leonid Kopylev/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA,
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HILBERTJ@UCMAIL.UC.EDU, David Berry/R8/USEPA/US@EPA
Date: 10/02/2012 05:08 PM
Subject: OHSA Report

I did read the material that Tim sent. At this point I think my preference is to expand the UC appendix to put in some more detail on the operations in the facility and the dust control measures put in place, rather than cite another document. UC has a lot more information from other documents, company records, and the focus groups. The description from OHSA is entirely consistent with the IH data showing high exposure during clean-up. However, I will keep an open mind on this.
I started a new message string as this is a somewhat different topic.